

Schnitzer, Edward L.

From: Hwang, Angeline <Angeline.Hwang@weil.com>
Sent: Wednesday, November 13, 2019 3:08 PM
To: Schnitzer, Edward L.; TumSuden, Kyle J.; Fail, Garrett; Singh, Sunny
Cc: Project Blue Admin Team; 'Sears Admin Consent Program'
Subject: RE: Sears/Ninth Omni Objection | Subject to FRE 408

Ed,

M-III has reviewed the claim and supporting data, and the Debtors agree with the amount of the 503(b)(9) claim. However, we have asked ASK, the firm handling the Debtors' preference workstream, to reach out regarding the Debtors' preference claims against NorCell. Please let us know if you do not hear from them by the end of the week.

Best,



Angeline Hwang

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Angeline.Hwang@weil.com
+1 212 310 8258 Direct
+1 212 310 8007 Fax

From: Schnitzer, Edward L. <ESchnitzer@mmwr.com>
Sent: Wednesday, November 13, 2019 2:15 PM
To: Hwang, Angeline <Angeline.Hwang@weil.com>; TumSuden, Kyle J. <Kyle.TumSuden@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny <sunny.singh@weil.com>
Cc: Project Blue Admin Team <Project.Blue.Admin.team@weil.com>; 'Sears Admin Consent Program' <searsadminconsentprogram@miiipartners.com>
Subject: RE: Sears/Ninth Omni Objection

Angeline,

I am following-up on the information provided below. Do you know if the claim has been reconciled?

Thanks
-Ed



Edward L. Schnitzer | Partner | Chair, Bankruptcy & Financial Restructuring Group
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7781 | Fax: 212-599-5085 | eschnitzer@mmwr.com | [Attorney Profile](#)

From: Schnitzer, Edward L.
Sent: Friday, November 08, 2019 3:27 PM

To: 'Hwang, Angeline'; TumSuden, Kyle J.; Fail, Garrett; Singh, Sunny

Cc: Project Blue Admin Team; Sears Admin Consent Program

Subject: RE: Sears/Ninth Omni Objection

Angeline,

Attached is the information requested (this is also page 4 of the filed claim, but I have added in a 503b9 column).
The DUNS # is 122494917. There is no DBA. There are no post-petition claims.

-Ed



Edward L. Schnitzer | Partner | Chair, Bankruptcy & Financial Restructuring Group
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7781 | Fax: 212-599-5085 | eschnitzer@mmwr.com | [Attorney Profile](#)

From: Hwang, Angeline [<mailto:Angeline.Hwang@weil.com>]

Sent: Friday, November 08, 2019 1:56 PM

To: Schnitzer, Edward L.; TumSuden, Kyle J.; Fail, Garrett; Singh, Sunny

Cc: Project Blue Admin Team; Sears Admin Consent Program

Subject: RE: Sears/Ninth Omni Objection

Ed – M-III has requested the below information for the reconciliation process, in excel if possible:

Include the following fields at a minimum (if applicable):

1. DUNS (unique identifier(s) with Sears and its affiliates)
2. DBA name(s) (Doing Business As, if there is another name your company goes by)
3. Invoice Number
4. Purchase Order Number
5. Invoice Date
6. Invoice Amount
7. 503(b)(9) "Y" or "N": (mark "Y" next to any invoices you believe are entitled to priority pursuant to section 503(b)(9) of the United States Bankruptcy Code)
8. Administrative "Y" or "N" (Post-petition/Post-Bankruptcy): (mark "Y" next to any invoices you believe are post-petition/post-bankruptcy administrative invoices)



Angeline Hwang

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Angeline.Hwang@weil.com
+1 212 310 8258 Direct
+1 212 310 8007 Fax

From: Schnitzer, Edward L. <ESchnitzer@mmwr.com>

Sent: Friday, November 8, 2019 1:44 PM

To: Hwang, Angeline <Angeline.Hwang@weil.com>; TumSuden, Kyle J. <Kyle.TumSuden@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny <sunny.singh@weil.com>